1   Q   Okay. Thank you. Ms. Halloran? Mr. Hoe?

2   A   (Hou) This is Michael Hou speaking on

3   behalf of AT&T. In talking about NYNEX's resell

4   Operating Support Systems capability I would like to

5   talk about what we feel are the criteria to

6   understand whether NYNEX has parity with, provides

7   parity to its CLECs in terms of Operating Support

8   Systems.

9   Two carriers to look at is what I've coined

10   commercially reasonable capabilities, and

11   commercially reasonable means that there is parity

12   with NYNEX resell operations in terms of timeliness.

13   We talk about approximate response rates for

14   pre-service order information, accuracy of

15   information, reliability of the system so that the

16   system, if the system is going down for resale, then,

17   obviously, it may affect that but, if there is

18   discrepancy in terms of availability of the systems,

19   that's, again, a non-parity situation.

20   Finally, there should be parity in terms of

21   ability to handle the volumes that retail has as well

22   as the volumes that the CLECs project they want to

23   send over. When we talk about operational readiness,

24   Mr. Miller mentions about that they are operationally

1   ready for, at least from a resell perspective for EDI

2   capabilities, and I'd like to just make a point that

3   readiness cannot be declared by a single party.

4   There are a series of steps that are

5   involved to ensure that you're operationally ready,

6   one is definition of the system requirements,

7   definition of the interfaces.

8   Remember, it takes two people to talk to

9   each other in an electronic manner and that involves

10 defining data elements, which there are quite a bit,

11 30,000 or so for resell-wide, business rules and how

12 these data elements should be governed. Again, I'll

13 give you an example: A data element is, by the way,

14 name, address, what's the service type, reseller I-D.

15 There are also business rules that govern data

16 elements.

17   For instance, like listings information,

18 NYNEX has made a requirement that said when you send

19 listing name over it has to be in all caps. Then you

20 could have to test data elements and a play them to

21 what we call the interface specs or definitions, as

22 in EDI or EIF which are both application-to-

23 application type interfaces.

24   Once these things have been jointly defined

1   and jointly documented and baselined, then each party

2   goes back and develops a test, first begins the

3   system-to-system testing and then you add in the

4   operations with the actual customer service rep on

5   the line and see if the interfaces work and then you

6   train the reps and afterwards you actually begin a

7   market implementation and even then you have to make

8   sure it support commercial reasonably quantities of

9   volumes.

10   Our experiences with at least from the EDI

11   perspective, let me start with that, is that we've

12   been, since we have been discussions with NYNEX as

13   early as July of last year, we have been working

14   constantly with NYNEX to try to resolve

15   inconsistencies, omissions and discrepancies with

16   their EDI documentation and, as I mentioned in my

17   affidavit, I documented a series of meetings on

18   letters we've had to try to identify and try to

19   understand, clarify what are the data elements, what

20   are all the required information that we need to send

21   them, how they should be formatted, et cetera.

22   And to this date we are still resolving, in

23   fact, one of the issues we've had is NYNEX has

24   documented EIF specifications, EDI specifications, as

1   well as their data elements. However, if you look

2   across all three documents there are omissions and

3   discrepancies across three documents.

4   We have taken the initiative to try to

5   resolve these discrepancy many times by consolidating

6   all this information together into the 700-page

7   document as well as trying to understand the mappings

8   between data elements, business rules to interface

9   specifications.

10   Bottom line is how does it affect the

11 customer, how does it effect our ability to enter the

12 market. If you do not resolve these issues and plan

13 these ahead of time, what happens is that both

14 parties start developing to this and when they find

15 out when they start testing or when they try to do

16 market implementation the orders will not flow

17 through, therefore, customers don't get the service

18 they want.

19   Again, that's one of the big hesitancies

20 that we have at AT&T; we don't want to come in and

21 give customers false expectations we're ready to

22 handle capacity and volume orders without ensuring

23 the orders will go through properly and that's why

24 we've been trying to resolve over 50 papers of what

1   we've documented in terms of omissions and

2   discrepancies to date.

3   Another thing, talking about the web GUI, I

4   want to make it very clear that it is not an

5   electronic interface, okay. An interface is really a

6   common point of interconnection between two systems

7   where the systems interact upon each other and

8   increase without human intervention, okay.

9   A web GUI interface, as we've discussed,

10   involves not only our customer reps entering

11   information to the web GUI but then going back and

12   reentering the same information to our internal

13   system. Why is it we have to reenter information

14   again?

15   One, we have to know when the customer

16   calls us to let the customer know what they have.

17   Second, we need to be able to bill back to our

18   end user so that's why we need to have such

19   understanding internally in our capabilities.

20   Again, compared to the NYNEX rep they do

21   not have to do double entry of order information and

22   also that there is a certain other aspect we can

23   discuss more but I think that's the main point; a web

24   GUI is not an electronic interface.

1   In terms of metrics and performance,

2 Mr. Miller mentions a lot that it's comparable. I

3 think that one of the concerns I have and one of the

4 things we've been trying to work with NYNEX on is

5 understanding what are the actual metrics in the

6 retail side. What I mean by metrics, there are

7 metrics defined by the New York Public Service

8 Commission from an end user perspective, but in order

9 for us to effectively serve our own end users, we

10 need to have the assurance because we have all this

11 dependency on NYNEX in being able to relieve customer

12 service records, retrieve numbers from NYNEX as well

13 as processing service orders.

14   So what we need are these intermediary

15 carrier-to-carrier metrics defined as well as an

16 understanding how NYNEX from a retail operations in

17 terms of lead time, response times as we said

18 Mr. Kennedy had mentioned before.

19   I do not see any evidence right now that

20 NYNEX comparatively shows that, you know, for

21 instance, like a preorder transaction, like an end

22 number, checking for installation time, that they can

23 say we can do this in X amount of seconds. I don't

24 understand what is their retail metric and I'd like

1   to see an example of what they are doing today for

2   resellers. Again, I think I heard a minute 40

3   seconds. I find it hard to believe in my opinion

4   that non-New York retail rep experiences that amount

5   of time for retrieving, let's say, customer service

6   records or more specifically number assignments or

7   submitting repair tickets, which I think are very

8   critical things, because we talk about pre-service

9   order maintenance. Most of these activities occur

10   when the customer is on the line.

11   So, for instance, if a customer calls me

12   and I have a problem, he says: "Can you tell me when

13   someone can come over and repair it?" I've got to

14   enter this information into the system and I have to

15   wait--tell the customer to wait for about a minute 40

16   seconds I can tell you when someone will come over to

17   fix the problem or to even check whether there is a

18   problem on the line.

19   So, other--there are other instances that

20   we have documented in my affidavit that I can go in

21   more detail, but in general there is also some parity

22   functions that I'm assuming that NYNEX's retail reps

23   have today that we are not, it's not available for

24   resellers today.

1   Let me give you an example. When a

2   customer calls a reseller or a CLEC and asks for, and

3   we submit an order for them, the customer sometimes

4   may change their mind. Whether it is installation

5   dates, whether it is they want to make a change to a

6   service order. NYNEX--today retail reps can submit

7   changes to service orders right then and there.

8   NYNEX says today for resellers they will

9   not allows you to send changes to service orders

10   until after NYNEX responds back to the initial

11   service order which can take anywhere today from 2 to

12   24 hours.

13   Last comment also I want to make is about

14   this concept of flow through or parity in human

15   intervention because I was reading over some of the

16   responses back from the recent interrogatories that

17   the Commission had directed, and that was that New

18   York Tel reps supposedly have the same amount of

19   human intervention or manual intervention as what a

20   CLEC would receive today and I would like to dispute

21   that fact for the record.

22   For instance, today, let me just give you

23   an NYNEX retail rep situation: Today a NYNEX retail

24   rep takes a customer order, submits it into the

1   systems and does not get touched by another human

2   again for at least for the residential orders and

3   POTS, my understanding. Again, my expertise is more

4   in on the residential side for that particular area.

5   Today my understanding as documented by

6   Mr. Miller, if a CLEC takes an order, they have to

7   enter it in and then NYNEX reps re-intervene again on

8   the order before submitting it actually into the

9   system, so, again, there is not a parity of that in

10 that particular situation.

11   So to summarize a long winded way that I do

12 not believe we have parity today from a CLEC

13 perspective with NYNEX retail operations and NYNEX

14 cannot handle, much less based on some of the

15 affidavits I've read so far, there are issues in

16 terms of volumes that I know Mr. Kennedy and the

17 other gentleman down, RCN have mentioned already some

18 difficulty they are experiencing in response time.

19 It makes me very nervous if we're going to send two

20 orders of magnitude more, more volumes how will NYNEX

21 system handle such a situation.

22 BY MR. KLEIN:

23   Q   Mr. Hoe, I have a question: You stated

24 that AT&T is hesitant to use the market until you're

1   sure the systems will work. Have you conducted tests

2   and, if so, what kind of tests to evaluate these

3   systems right now?

4   A   (Hou) The tests we have done first of all

5   have observed the preorder web GUI situations as well

6   as the maintenance trouble tickets. We have had

7   similar issues with maintenance in terms of

8   information on metallic line testing capabilities.

9   We have noticed problems in being able to dial up

10 into the systems during busy hours as well as noting

11 some of the response time that Vern Kennedy had

12 mentioned before.

13   Q   Okay. Thank you.

14   A   (Spivy) My name is Adelene Spivy. I'm

15 testifying on operation support systems on behalf of

16 MCI Telecommunications, and I'll be speaking from

17 really two perspectives, two sets of experiences that

18 MCI has had in trying to achieve operational

19 readiness with NYNEX.

20   We've been working on two basic premises

21 conducting live service trials. We have been doing

22 that in a couple of bases. We've been asking for

23 employee volunteers to set up test lines in their

24 homes. We have set up facilities ourselves to just

1   testing up and rented facilities test lines, to go

2   through a series of tests of both just the baseline

3   services that's being provided, how quickly it is

4   provided, any errors in provisioning. We've been

5   using primarily the web GUI application during this

6   point in our trials.

7   Second avenue is we've been working very

8   extensively with NYNEX on implementation planning and

9   testing to set up electronic data interexchange,

10   interfaces, EDI interfaces with NYNEX.

11   We've also been testing one form of EIF

12   transaction, the feature availability inquiry

13   transaction so we do have some experiences E2 on EIF.

14   So with these two different perspectives, both

15   trialing and implementation planning and testing, I'd

16   like to highlight some of the challenges that we've

17   experienced and where we think we have seen disparity

18   and where we think we are in a very difficult

19   position to be able to provide service on a

20   commercially available basis and truly mass market

21   local service for residential and small business

22   customers in New York, not to mention support of the

23   complex services that we would need to offer a large

24   business customers.

1   I'll try to highlight some of the issues

2 that we have run into in our trial phase. With

3 respect to scheduling due dates, for example, we

4 found that we've seen in one case, although it is

5 very hard to find a specific situation where you can

6 test this but we found that we do have due dates

7 scheduling disparity between what we can schedule,

8 what time of day we ask schedule an appointment for a

9 given customer that needs a new line in a GUI and the

10 date that one customer might receive if they called a

11 retail NYNEX service center.

12   In setting up some of our lines we found

13 that we had as much as a, I believe it was a four-day

14 discrepancy in the business days and what due date we

15 could find.

16 BY JUDGE STEIN:

17   Q Maybe you can clarify your statement for

18 the record. What are the disparities between the day

19 the customer says they will be available?

20   A (Spivy) Specifically, we were trying to set

21 up a new service, a new line, a new line, that is for

22 being installed, and using the GUI, web access

23 system; it was actually specifically just to make the

24 date so we can see the different timeframes. On the

1   6th of February we were trying to schedule a due

2   date. We were using the GUI. The earliest available

3   date we were able to obtain was for the 18th of

4   February.

5   This seemed to be a very lengthy period of

6   time to wait and we thought that we might also try to

7   compare that to what the timeframe would be should we

8   try to schedule a new line install through the retail

9   center for the same location.

10   Q   So this was to provide a new line?

11   A   (Spivy) Yes, this was a new line. And in,

12   in calling the retail center and trying to set up a

13   new line to the exact same location, the exact same

14   set of services, we found that we had a first

15   available install date of the 12th of February.

16   We have--we are not sure why there are such

17   discrepancies but it is of some concern to us. It is

18   our understanding that we are literally logging into

19   the same, you know, back-end scheduling systems that

20   any NYNEX retail representative would be logging

21   into.

22   Similarly, with the dates that we have been

23   able to schedule and for the dates where we've

24   received a committed due date from NYNEX, we've had a

1   number of orders that have not met committed due

2   dates provided by NYNEX.

3   Our most recent trial, 35 of 47 orders that

4   we submitted missed committed due dates by NYNEX, and

5   the range was about one to four days. That was the

6   average, maybe one to two days. In these instances

7   we did not receive any delay notification.

8   There's also been discrepancies with some

9   of the dates that are updated in the systems. For

10   example, we have found some cases where a completion

11   date on the customer service record has indicated

12   that the service has been converted or flipped as we

13   call it. We found that may differ from the actual

14   date of the completion notification that NYNEX has

15   provided to us.

16   We're really concerned about this because

17   we feel there might be some propensity for double

18   billing of the customer whereby there may be some

19   overlap in billing, maybe one or two days, maybe

20   longer, hopefully not, but, of course, these, all of

21   these thinking of days is very critical.

22   And, also, just to demonstrate sort of on

23   the same theme that the flow through or lack of flow

24   through of the ordering provisioning process, there

1   appears to be a definite delay from the time when we

2   submit an order through the graphical user interface

3   system and when that might be input into NYNEX

4   systems.

5   It appears that, in a recent order specific

6   that was sent on the 27th of March, on our firm order

7   confirmation it appeared it didn't enter the NYNEX

8   system until the 1st of April.

9   Q   Excuse me. Let me just ask you to clarify.

10   You're talking about the, this is the gap where the

11   human interaction takes place where it is printed

12   from the web GUI, an order is printed, right; is that

13   what you said?

14   A   (Spivy) That's our interpretation of this

15   discrepancy. We do understand that all of the orders

16   that we submit today through the GUI are then

17   manually reentered into the system, and we expect

18   that there is likely to be a backlog whenever you

19   have this type of manual intervention. Our concern

20   is by the time it actually enters the NYNEX system

21   and gets into provisions queue that we're looking at

22   really different lengths of time for provisions

23   customer service.

24   Q   But you're also assuming that the date of

1   the firm order commitment is the date that your order

2   would have been entered into the NYNEX system?

3   A   (Spivy) It was two different dates. We had

4   a commitment date on the firm order confirmation and

5   there was the date that it showed that it was entered

6   into the NYNEX system, so there seems to have been

7   some delay there, and which we anticipate and we

8   understand that there is work being done to improve

9   flow through provisioning. I'm not sure, I haven't

10   heard of the eight different types of orders that now

11   can be supported through flow through provisioning.

12   We have not been given any commitments on

13   when actually this would be put in place, and we had

14   heard maybe there would be some flow through for

15   migration as is orders, certain types of orders which

16   we think will be the minority, potentially the

17   minority of the types of orders they will be sending

18   given the business rules surrounding those particular

19   types of orders.

20   Moving on to other issues that we uncovered

21   in our trial phase, similarly, and sort of

22   benchmarking response times that we found using the

23   GUI, we used the CFR, for example, to retrieve the

24   customer service record and we timed three different

1   occasions, actually last Friday, the 28th and the

2   times that we found have been pretty consistent with

3   what we've seen since we've been using this GUI since

4   January in an active state.

5   The benchmarking resulted in time for

6   pulling CSRs of a minute and 57 seconds, a minute and

7   40 seconds and a minute and 15 seconds, so there is

8   some variation, but we did find that we have through

9   similar issues with response times that other

10   witnesses have testified to today.

11   We did have even one experience where we

12   requested a CSR and we waited and waited; we waited

13   15 or 20 minutes and we never saw it, and you know

14   you have to keep polling the system to find it.

15   Eventually, I guess we gave up and came up

16   an hour later and it had arrived but our concern is

17   how reliable is this. Again we have a customer on

18   the phone, wait a little longer. Wait a little

19   longer. I almost have it, and you know when do we

20   give up and you know call them back.

21   When talking about customer callbacks, that

22   is expensive. We cannot afford in mass marketing of

23   any service. We have to complete our transactions on

24   one call and the customer expects that. We all have

1   order book service and we expect to be able to

2   conduct all of our business, especially, really, from

3   a residential and small business perspective, we

4   expect that we will be able to complete it on one

5   phone call, and from what we can tell, we don't have

6   what we need as a CLEC to be able to do that for our

7   customers and we will be perceived as a less than

8   capable provider as such.

9   Other issues that we found with the GUI in

10   our trials, there seemed to be areas of the GUI that

11   were not functionally complete, scenarios that were

12   not yet programmed into the GUI. Over time we've

13   seen there have been some improvements but being able

14   to disconnect to what we call a partial disconnect

15   where a customer may want to disconnect a portion of

16   the line that they have, they have five lines and we

17   want to disconnect two. That was not supported.

18   We found that it was very poor support for

19   being able to support multiple features on a single

20   order and it is very cumbersome for the CLEC and we

21   do not believe from--we understand that NYNEX resale

22   reps have this same burden.

23   We experience a lot of error messages that

24   we cannot interpret. Again we--the image we have the

1   customer on the phone, we rated our minute and-a-half

2   for a transaction and we get this error message that

3   we just cannot explain, and, you know, again that's

4   where we hang up with the customer or where do we go

5   from there.

6   Also, I'd like to highlight that these

7   preordering functions we're talking about one

8   function. Typically, you have to go through three to

9   five of these preordering steps for a single order,

10   so we're talking about three to five of these lengths

11   of time where we're trying to obtain the necessary

12   information to fill out a single order for

13   potentially even just a simple residential local

14   service order.

15   Using the GUI we've definitely needed a lot

16   of support and we have found that helped out

17   facilities today that NYNEX says, "We find that we

18   never know if someone is going to be there." We do

19   find help there sometimes. They do not appear to be

20   completely knowledgeable and able to resolve our

21   issues as quickly as we would like. That's in one

22   area that we think could be drastically improved and

23   will be critical for getting into a full competitive

24   stage.

1   Another specific example is for some reason

2   the ANI, the telephone number reservation function on

3   the GUI has been, I would just say, broken over the

4   last few weeks. We haven't been able to get phone

5   numbers for the orders we've been placing. We've

6   been employing a work around in that instance has

7   been helpful in looking up the numbers. They are

8   actually reserved. They are reserved in the NYNEX

9   system but we can't see them.

10   Trying to move into a few more heavy

11   implemented arbitration, shift gears. There's been

12   talk about some of our experiences in trying to set

13   up a service using the EDI for ordering in particular

14   which we think is really the only way to be able to

15   mass market our services to be able to send these

16   orders electronically from our system directly to

17   their system without reentering of orders, and

18   working through this effort and Michael did a very

19   good job explaining all the stages that you have to

20   go through, you know.

21   I think the biggest thing is just trying to

22   work through the business rulings and the

23   specifications and the data elements, and what we

24   have to work with, what NYNEX has provided, we have

1   found that there are many holes in the

2   specifications. There are entire scenarios that are

3   not explained as to how they should be supported in

4   this EDI interface.

5   Again, the example I would give for--one

6   would be doing a partial migration, migrating a

7   customer may have five lines. They want two lines to

8   go to MCI. The directory listing support, directory

9   listings are critical for customers. Messing up

10 someone's directory listings can result in lawsuits,

11 I understand, and the support for that in this

12 interface is minimal. Business rules around the few

13 pieces of support for like main line listing are even

14 not fully flushed out.

15   We just find even the smallest of errors

16 and discrepancies where two character fields are

17 supposed to fit three character data elements, and so

18 we're a ways from where we need to be to really be

19 able to put this kind of interface into operation.

20 We've been working diligently over the last several

21 months trying to get certification test scenarios

22 from NYNEX, and what I mean here is typically for

23 operational readiness behave a list of all the

24 critical order type scenarios to that the system

1   should be able to interface and process successfully.

2   Just establishing this list has been a

3   challenge. I think we know what our list is but in

4   NYNEX's documentation they reference that there is a

5   certification tests that we will put through and then

6   we've gone through quite a challenge just trying to

7   get a list of what that is. We recently did receive

8   that within the last week. We had been requesting it

9   and actually talking about developing this test plan

10 since our meetings in early January.

11   We've already picked out a test order or

12 test transaction in an attempt to sort of

13 simultaneously begin testing and working out all of

14 our business rule issues. We're trying to expedite

15 the process as much as possible. Even the initial

16 orders that we've sent, we've sent some last week, in

17 fact, the beginning of last week, and from what we

18 can tell, NYNEX has not even gone to pull those

19 orders, those test orders from their system, yet,

20 today, to create the responses back to our system.

21   This type of testing, this, to be

22 operational ready in the timeframes that we would

23 like to be operational ready requires really

24 day-to-day activity. It requires a good deal of

1 commitment, and although we have now established good

2 points of contact with an IXC and we are moving

3 forward on this.   This is still a long way from being

4 an operationally ready state and being able to

5 support a fully competitive environment.

6   We've had challenges—

7 BY JUDGE STEIN:

8   Q   Can I ask you if—you're still doing

9 trials?

10   A   (Spivy) Actually implementation.

11   Q   With real customers?

12   A   (Spivy) No.

13   Q   With employees and—

14   A   (Spivy) Well, actually, the implementation

15 planning trying to set up the EDI error case we are

16 very far from being able to send orders for customers

17 for live provisioning.   Really the trialing we can

18 only accomplish using the GUI.

19   Q   I see.   Please proceed.

20   A   (Spivy) Sorry.   Sorts of on the

21 implementation perspective.   It is what we're trying

22 to set up.   We're actually being ready on a

23 commercial available basis.   Without having the EDI

24 interface up we do not feel we will be able to offer

1   service on a commercially available basis.

2   We have tried doing manual order processing

3   in other markets before and it has not been the

4   answer. It has been something that we will avoid at

5   all costs, and I guess moving a little further to

6   some of our issues and trying to set up the EIF

7   transaction that I mentioned which was in our case we

8   were testing the feature availability transaction

9   whereby you can make an inquiry to NYNEX and you can

10   obtain all the information about what particular

11   services and features would be available for a given

12   customer in a given area.

13   We see this particular function as critical

14   to our sales process. For every customer we speak to

15   we want to know what is the full suite of offerings

16   we can provide to this customer. We certainly don't

17   want to be in a position where we offer someone the

18   ability to sign up for Caller I-D and it is not

19   available at their location and have to call them

20   back later.

21   In setting up this, our biggest challenge

22   has been that we finally figured out the right

23   specifications. There were a few specification

24   changes during the time they were doing our analysis

1   and there was a recent specification upgrade March

2   1st but in looking at the specifications we can even

3   exchange this data but we have been unable to obtain

4   from NYNEX really what this data is. They have set

5   it up such that there are certain indicators.

6   I might say the blocking indicator. What

7   does the blocking indicator mean? Does that mean

8   that this man can't have which type of blocking? I

9   mean, there's literally about 10 or 12 different

10 types of blocking options. Is that any one of them?

11 Is there more to it than this?

12   That's one element of numerous that we've

13 been working at over a month trying to get the

14 details of what data we're receiving without

15 understanding that we can't possibly program that

16 into our systems, and these types of delays there

17 really are, frankly, shutting down a lot of our

18 progress on building the interfaces and the internal

19 systems that we need to get to market.

20   We do have some limited experience with

21 response times, using this EIF transaction and we

22 found generally over a minute, maybe a minute to two

23 minutes, that tends to run pretty parallel to

24 Mr. Kennedy's experiences.